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 Aktiengesellschaft, Werner Baumann,  
 Werner Wenning, Liam Condon, Johannes  
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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

SHEET METAL WORKERS' NATIONAL  
 PENSION FUND and INTERNATIONAL  
 BROTHERHOOD OF TEAMSTERS  
 LOCAL NO. 710 PENSION FUND,  
 individually and as Lead Plaintiffs on behalf  
 of all others similarly situated, and

INTERNATIONAL UNION OF  
 OPERATING ENGINEERS PENSION  
 FUND OF EASTERN PENNSYLVANIA  
 AND DELAWARE, individually and as  
 Named Plaintiff, on behalf of all others  
 similarly situated,

Plaintiffs,

vs.

BAYER AKTIENGESELLSCHAFT, WERNER  
 BAUMANN, WERNER WENNING, LIAM CONDON,  
 JOHANNES DIETSCH, and WOLFGANG NICKL,

Defendants.

Case No: 3:20-cv-04737-RS

CLASS ACTION

**JOINT STIPULATION AND  
 [PROPOSED] SCHEDULING  
 ORDER**

Ctrm: 3 – 17th Floor  
 Judge: Richard Seeborg

Pursuant to Local Rule 6-2, the parties respectfully request the following:

WHEREAS, on January 10, 2025, the Court issued an amended scheduling order in this proceeding (ECF No. 233), setting deadlines for the filing of dispositive motions, oppositions and replies to such motions, and a hearing on pretrial motions;

WHEREAS, on February 25, 2025, the parties filed a joint notice of settlement (ECF No. 244), notifying the Court that the parties had reached a settlement in principle in the above-captioned matter and that upon finalizing the terms of the settlement agreement and establishing a class action notice and administration plan, Plaintiffs would file an unopposed motion for preliminary approval of the class action settlement;

WHEREAS, subsequently on February 25, 2025, the Court ordered that the parties file a motion for preliminary approval of class action settlement on or before April 11, 2025 (ECF No. 245) and entered a notice vacating a case management conference set for March 27, 2025 (ECF No. 246);

WHEREAS, the parties have conferred regarding the currently scheduled deadlines for the filing of any dispositive motions and any oppositions and replies to such motions and the currently scheduled deadline for the hearing of any pretrial motions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiffs<sup>1</sup> and Defendants by and through their respective counsel and subject to the approval of the Court, that:

1. The deadlines for the filing of any dispositive motions, any oppositions to dispositive motions, and any replies to dispositive motions are stayed pending the Court's review of the proposed settlement.
2. The deadline for the hearing of any pretrial motions is stayed pending the Court's review of the proposed settlement.

IT IS SO STIPULATED.

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<sup>1</sup> Plaintiffs include Lead Plaintiffs Sheet Metal Workers' National Pension Fund and International Brotherhood of Teamsters Local No. 710 Pension Fund, and additional plaintiff International Union of Operating Engineers Pension Fund of Eastern Pennsylvania and Delaware.

Dated: March 24, 2025

By: /s/ David J. Wiener  
David J. Wiener

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By: /s/ Carol V. Gilden  
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**CERTIFICATE PURSUANT TO LOCAL RULE 5-1(i)(3)**

In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

By: /s/ David J. Wiener

David J. Wiener

**ORDER GRANTING STIPULATION**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date:

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HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE